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Attorneys for Defendants
Global Pro System, Inc. and
Healthy Choice Labs, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

KASSIE MERRITT, individually and
behalf of all others similarly situated,

Plaintiff,

v.

CV No. 6:15-cv-00269-TC

DEFENDANTS GLOBAL PRO
SYSTEM, INC.'S AND HEALTHY CHOICE
LABS, LLC'S SECOND UNOPPOSED
MOTION TO EXTEND TIME TO APPEAR

YAVONE LLC, a California limited
liability company, HEALTHY CHOICE
LABS, LLC, a Nevada limited liability
company, and GLOBAL PRO SYSTEM,
INC. a Nevada corporation,

Defendants.

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7-1, the undersigned certifies that the counsel for Global Pro System, Inc. ("Global Pro") and Healthy Choice Labs, LLC ("HCL") conferred with counsel for plaintiff and that plaintiff's counsel does not oppose the extension requested in this motion.

MOTION

In accordance with Federal Rule of Civil Procedure 6(b), Global Pro and HCL move the court for an order granting it an extension of time to May 18, 2015, in which to respond to the complaint, without prejudice to Global Pro's or HCL's rights to file a motion seeking dismissal.

MEMORANDUM OF LAW

Plaintiff filed its complaint on February 17, 2015. On March 13, 2015, Global Pro filed an unopposed motion for extension of time to respond to the complaint until April 27, 2015, which the Court granted on March 19, 2015. (Dkt. Nos. 3 and 4.) On March 20, 2015, HCL filed an unopposed motion for extension of time to respond to the complaint until April 27, 2015, which the Court granted on March 23, 2015. (Dkt. Nos. 5 and 6.)

This motion is not made for purposes of delay. Global Pro and HCL do not waive any objections, defenses, motions, responses, or claims it may have in this action by filing this motion, including but not limited to any defenses as to personal jurisdiction, statute of limitations, or otherwise.

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CONCLUSION

Global Pro and HCL respectfully request an extension of time to respond to the complaint to May 18, 2015.

DATED this 17th day of April, 2015.

MILLER NASH GRAHAM & DUNN LLP

/s/ Jonathan H. Singer

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I hereby certify that I served the foregoing Defendant Global Pro System, Inc.'s and Healthy Choice Labs, LLC's Second Unopposed Motion to Extend Time to Appear on:

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by the following indicated method or methods on the date set forth below:

- ☒ **CM/ECF system transmission.**
- ☐ **E-mail.** As required by Local Rule 5.2, any interrogatories, requests for production, or requests for admission were e-mailed in Word or WordPerfect format, not in PDF, unless otherwise agreed to by the parties.
- ☐ **Facsimile communication device.**
- ☐ **First-class mail, postage prepaid.**
- ☐ **Hand-delivery.**
- ☐ **Overnight courier, delivery prepaid.**

DATED this 17th day of April, 2015.

/s/ Jonathan H. Singer

Jonathan H. Singer, OSB No. 105048

*Of Attorneys for Defendants Global Pro System,
Inc. and Healthy Choice Labs, LLC*